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Cc: Willard Potter[otto@demaximis.com]; Mike Barbara (mab.environmental@gmail.com)[mab.environmental@gmail.com]; Basso, Ray[Basso.Ray@epa.gov]
From: LaPoma, Jennifer
Sent: Thur 5/26/2016 12:54:01 PM
Subject: LPRSA RI Comment Follow Up - Comment 110

Rob,

As a follow up to our discussion yesterday, below are some key points to include in the revised draft RI to address comment 110:

The CPG should prepare the nature and extent discussion for the upper portion of the LPR (above RM8.3) and include an overview discussion that sufficiently describes the nature and extent of contamination in the lower 8.3 miles. Discussion should be structured so that relationships (similar and/or different) on nature and extent between the two sections are realized. Detailed discussion of the upper section in combination with the overview discussion of the lower section would provide a strong holistic understanding of the 17 miles.

Nature and extent of contamination in subsurface sediments. Examples of presentation methods to present these data are:

- Core profiles for selected contaminants (see example from Remediation Investigation Report for the Focused Feasibility Study (RI/FFS) Report Figures 4-63).
- Scatter plots of subsurface sediment concentrations by river mile. Plots would present surface, shallow subsurface and deep subsurface data on a single page for a single contaminant (see example from RI/FFS Report Figure 4-2 of surface sediments 0 – 6").

- Lateral distribution of contamination presented for multiple depth intervals – surface, shallow subsurface and deep subsurface.
- Histograms showing relationship of average surface to average subsurface sediment concentration by reach

Nature and extent discussion should also focus on factors (originating from data, observations, and other empirical evidence) that may result in subsurface sediment contamination reaching the surface where exposure may occur. Discussion in the revised draft RI should include:

- Erosion associated with flow rates, currents and waves
  - ○ Identification of nearshore areas subject to waves
  - ○ Evaluation of surface to subsurface sediment concentration ratios
  - ○ Evaluation of site bathymetry to identify areas with erosion and deposition
  - ○ Evaluation of sediment grain size to identify areas of high and low energy
  - ○ Erosion prone river features (e.g., outside bends of the river, CSO discharge features, bridge structures)
- Anthropogenic influences (propwash and dredging)
  - ○ Identification of shallow areas potentially subject to propwash
  - ○ Identification of areas where navigation dredging may be required
- Advective groundwater transport

o Evaluation of regional and/or localized groundwater data to identify areas with elevated groundwater flux rates

If you have any questions please let me know.

I will send a separate email later this morning with the example tables from the lower 8.3, Gowanus, and Raritan Slag as a follow up to comment 109.

Thanks,

Jennifer LaPoma